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REQUEST NO. 5: Admit that Steve Ward never handcuffed you on December 20, 2009
at Radnor Lake.

True.

REQUEST NO. 6: Admit that you have commented about the events you are alleging in
the Complaint in internet discussion forums under the name "Kwikrnu."

True.

Respectfully submitted,

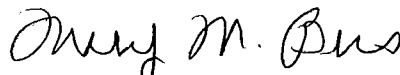
ROBERT E. COOPER, JR., BPR #010934
Attorney General & Reporter



MARY M. BERS, BPR #013159
Senior Counsel
Civil Rights & Claims Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-1845

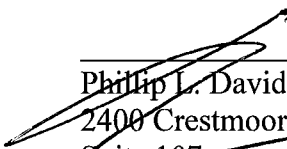
CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded by U.S.
Mail, first-class postage pre-paid, to Phillip L. Davidson, 2400 Crestmoor Road, Suite 107,
Nashville, TN 37215 on this 17th day of August, 2010.



MARY M. BERS

Respectfully submitted,



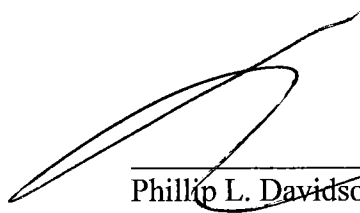
Phillip L. Davidson, #6466
2400 Crestmoor Road
Suite 107
Nashville, Tennessee 37215
(615) 386-7115

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was delivered by first class mail to

Mary M. Bers
Senior Counsel
Civil Rights & Claims Division
PO Box 20207
Nashville, TN 37202-0207

this the 22 day of April, 2010.



Phillip L. Davidson